

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	05/04/2016		
Media:	Wastewater		
Regulatory Program(s)	Environmental Protection Agency		
Company Name:	Ruidoso/ Ruidoso Down		
Facility Name:	Village of Ruidoso Wastewater Treatment		
Facility Physical Location:	26715 U.S. 70		
(city, state, zip code)	Ruidoso Downs, NM 88346		
Mailing address:	313 Cree Meadows Drive		
(city, state, zip code)	Ruidoso, NM 88345		
County/Parish:	Lincoln County		
Facility Contact:	Isaac Garcia	Chief Plan Operator	
	IsaacGarcia@ruidoso-nm.gov		
FRS Number:	110010721950		
Identification/Permit Number:	NM0029165		
NAICS:	N/A		
SIC:	4952		
Personnel participating in inspection:			
Mitty Mohon	EPA Region 6 – Dallas	Environmental Scientist	214-665-6497
David Long	EPA Region 6 – Houston	Environmental Scientist	214-665-7323
Jennifer Foote	State of New Mexico Environmental Depart	Municipal Team Leader	505-827-0596
Isaac Garcia	Village of Ruidoso	Chief Plant Operator	505-378-8417
Bobby Snowden	Village of Ruidoso	Former Plant Operator (Retiring)	505-378-8417
EPA Lead Inspector			
Signature/Date	Mitty Mohon		Date
Supervisor			
Signature/Date	Carol Peters-Wagnon		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

U.S. Environmental Protection Agency (EPA) Region 6 inspectors Mitty Mohon and David Long arrived at the City of Ruidoso Downs/ Village of Ruidoso at 9:40 am on May 4, 2016 for an unannounced EPA inspection with Jennifer Foote, a state representative from New Mexico Environment Department. An entry briefing was conducted with Isaac Garcia and Bobby Snowden informing them this was an EPA compliance evaluation inspection (CEI) to be performed at the wastewater treatment plant (WWTP) facility located at 26715 U.S. 70, Ruidoso Downs, New Mexico. The purpose of the site visit was to inspect and review current WWTP operations. The inspection was conducted under the guidelines established by the EPA under the National Pollutant Discharge Elimination System (NPDES), in accordance with the Clean Water Act (CWA) for municipal wastewater treatment plants.

FACILITY DESCRIPTION

The WWTP for the Village of Ruidoso was updated and running since April of 2011. The Village of Ruidoso installed new technology and a different treatment process from traditional WWTP facilities. The influent from the city enters into a lift station with 4 influent pumps, each capable of pumping 2.5 million gallons per day (MGD). The influent flow meter is checked every day at 7:00 AM. The influent passes through quarter-inch screens for litter removal and the litter is sent to a dumpster, which is cleaned every Monday and Friday. After the initial screening, waste flows through a vortex grit chamber and grit pump. There is a post-screening influent meter to compare to the initial influent flow meter. The influent then flows through one of three 8-millimeter fine screens, each fine screen capable of processing 4 million gallons of wastewater. After litter and grit removal the wastewater goes to an anaerobic basin, then a deoxygenation basin, and into a pre-anoxic basin. The plant has 3 pre-anoxic working “trains” (similar to basins) but built a 4th “train” for future growth. Pre-aeration is the next step in the treatment process and then the wastewater flows to the post-anoxic basins, where 500 gallons of Alum is added a day to meet permit limits. The wastewater flows through the membrane bioreactors (MBRs), a suspended growth-activated sludge system that utilizes microporous membranes for solid/liquid separation instead of secondary clarifiers. The effluent then permeates to the ultra-violet (UV) disinfection systems before discharging to the Rio Ruidoso as described in the NM0029165 permit.

The WWTP has an in-house lab to analyze permit parameters but also send samples to a contract lab for quality assurance and quality control purposes. The lab overall was well organized and clean.

Section II – OBSERVATIONS

The WWTP has a flow capacity of 2.7 MGD but is averaging at 1.6 MGD. The staff stated the flows fluctuates based on the amount of tourist in the city. The plant is staffed with 6 operators and 2 administrative staff 5 days a week, Monday through Friday from 7:00 AM to 3:30 PM. There is an evening shift from 7:00 PM to 9:00 PM to spot-check facility equipment and ensure the plant is properly operating. There are 3 back-up generators that automatically self-checks every other week. The plant has a SCADA system with remote access capabilities. There are currently 2 overflow basins in case of an emergency, each capable of holding 300,000 gallons. The digester blowers and MBR train #4 are both under repair. Over the past year, several sanitary system overflows (SSO) have been reported in the collection system but are not part of the same department as the WWTP. Mr. Garcia mentioned

multiple times that the city's fat, oil, and grease (FOG) program needs to be more proactive because FOG has been a continuous issue for the plant and for the collection system.

There were only a few observations from the walkthrough of the plant. The fence/gate at the southwest corner of the plant was open and damaged. There was minor property damage due to cows getting into the plant. Since 2011, the plant built a new infrastructure but the old plant was not demolished. The new infrastructure already has noticeable cracks and signs of corrosion. The equalization basins from the old plant are now being utilized as holding tanks in case of an emergency. All power to the old plant equipment has been removed. Sludge was tracked out of the sludge holding areas most likely due to cows. In the equipment room, staff acknowledged that chlorine was utilized to clean the equipment onsite. After the UV disinfection system, the permit requires to take samples at outfall 001. The effluent sampler did not have a thermometer inside to ensure it was at the proper temperature.

The in-house lab was organized and clean. Most of the instruments and equipment were calibrated and up-to-date except for a thermometer in one of the incubators, which was missing a calibration tag. Chlorine is not being checked in Biochemical Oxygen Demand (BOD) samples since they are not using it as their treatment process but 40 CFR §136.3 refers to the standard method 5210 B-2001, which requires to check for chlorine residual in BOD samples. The facility utilizes liquid chlorine to clean equipment and pump the used chlorine cleaning by-product to the headworks of the treatment plant. There were minor issues with discharge monitoring reports (DMR) as inputting the parameter information on the wrong parameter line (December 2015 – Nitrogen). Visible mistakes (with red marks) were apparent on DMR but there were no initials next to the errors indicating who made the corrections.

Section III – AREAS OF CONCERN

The Village of Ruidoso facility had the following areas of concern:

- The Mayor of Ruidoso is the only representative certified to sign DMRs unless a letter of delegation is provided. Bobby Snowden, who signed the DMRs from March 2015 – March 2016, said he knew he was not authorized to sign the DMRs.
- No thermometer was found in the effluent sampler and no calibration tag was located on a thermometer in the lab incubator.
- The facility is using chlorine to clean their equipment that is then being pump to the headworks of the treatment process.
- In-house lab does not check for chlorine in their BOD sample as required in 40 CFR §136.3, which refers to the standard method 5210 B-2001.
- Gate and fence in the southwest corner of the facility are in disrepair.
- Sludge is being tracked outside of the holding areas.
- The facility is only 5 years old but there are already signs of corrosion as well as cracks developing on the structural walls of the facility.
- Multiple SSOs from clogged pipes in the collection system due to FOG.

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log (05/04/2016)

Appendix 1 – Photo Log

Photo File Name: Secondary Treatment_05.04.2016

Date of Photo: 05.04.2016

Time of Photo: 10:20 AM

Photographer: Mitty Mohon

Description: Diagram illustrating Ruidoso Secondary Treatment Structure

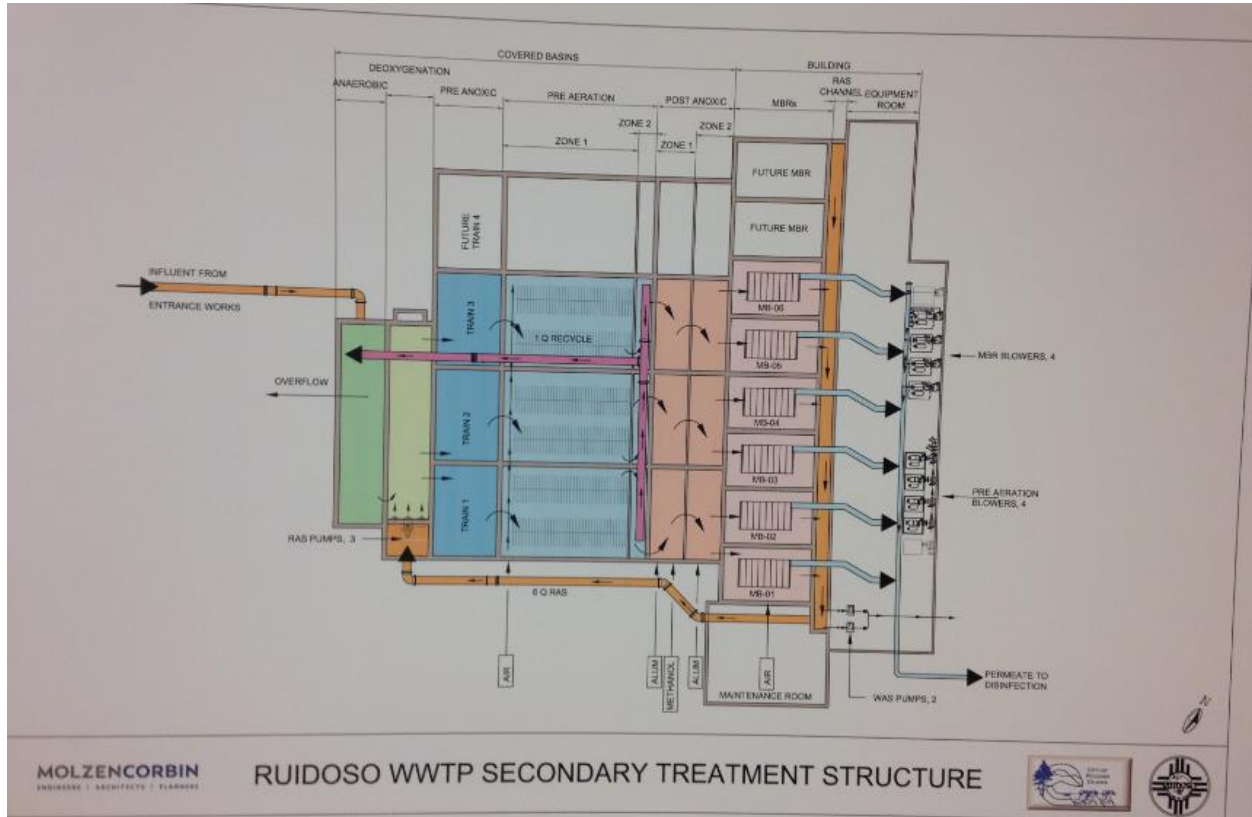


Photo File Name: Ruidoso Fencing_001

Date of Photo: 05.04.2016

Time of Photo: 11:33 AM MT

Photographer: Mitty Mohon

Description: Damaged fencing and gate (facing southwest).



Photo File Name: Ruidoso Sampler_002

Date of Photo: 05.04.2016

Time of Photo: 12:21 PM MT

Photographer: Mitty Mohon

Description: Effluent Sampler near the UV Disinfection system. The thermometer was missing from this sampler during inspection.

